UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF OKLAHOMA

JAMES GLITZ, et al., on behalf of Themselves and All Others Similarly Situated, Plaintiffs,) No. 5:12-cv-01341-W) <u>CLASS ACTION</u>)
vs. SANDRIDGE ENERGY, INC., et al., Defendants.))))
LOUIS CARBONE, on behalf of Himself and All Others Similarly Situated, Plaintiff,	No. 5:13-cv-00019-W CLASS ACTION
vs. SANDRIDGE ENERGY, INC., et al., Defendants.)))))

JOINT DECLARATION IN SUPPORT OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

We declare as follows:

- 1. We submit this joint declaration in support of our application for appointment as lead plaintiff for purchasers of the securities of SandRidge Energy, Inc. ("SandRidge" or the "Company") in these actions pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"). Each of us has personal knowledge about the information in this Joint Declaration relating to the entity or person with which we are individually associated.
- 2. I, James G. Mace, am the President of the third party administrator for the Northern Nevada Laborers Pension Trust Fund ("Northern Nevada Laborers"), a multi-employer pension fund with more than \$80 million in assets. Northern Nevada Laborers purchased SandRidge common stock at artificially inflated prices during the Class Period and suffered significant losses.
- 3. I, Jeffrey O'Connell, am a Trustee of the Construction Laborers Pension Trust of Greater St. Louis (the "St. Louis Construction Laborers"), a multi-employer pension fund with more than \$307 million in assets established for the benefit of members of the Laborers' International Union of North America Locals 42, 53 and 110, and their families. St. Louis Construction Laborers purchased SandRidge common stock at artificially inflated prices and suffered significant losses.
- 4. I, Vladimir Galkin, am a business owner. My wife, Angelica Galkin, Esq., and I purchased SandRidge common stock at artificially inflated prices during the Class Period and suffered significant losses.
- 4. Prior to filing the motion for appointment as lead plaintiff, Northern Nevada Laborers, St. Louis Construction Laborers and Vladimir & Angelica Galkin conferred with one another regarding this lawsuit and their role as lead plaintiff. Northern Nevada Laborers, St. Louis Construction Laborers and Vladimir & Angelica Galkin decided to move together in seeking appointment as lead plaintiff after due consideration and deliberation.

- 5. We knew that we did not have to seek appointment as lead plaintiff, either individually or jointly, to share in any potential recovery in this action. However, Northern Nevada Laborers, St. Louis Construction Laborers and Vladimir & Angelica Galkin, as two institutional investors and a non-institutional investor who suffered significant losses as a result of their purchases of SandRidge common stock, believe that our combined experience, sophistication and resources will enable us to vigorously represent the class's interests. Moreover, Northern Nevada Laborers and St. Louis Construction Laborers have a relationship that pre-dates this lawsuit since they previously worked together as lead plaintiffs in *In re ATI Technologies Inc. Sec. Litig.*, 05-cv-04414 (E.D. Pa.).
- 6. We are committed to maximizing the net recovery for the class consistent with good faith advocacy. We will continue to direct counsel and actively oversee the prosecution of the action for the benefit of the class by, among other things, reviewing pleadings, conferring amongst ourselves, directing counsel and/or attending hearings as necessary.
- 7. We believe that the law firm we selected as proposed lead counsel, Robbins Geller Rudman & Dowd LLP, is experienced in the area of complex securities class actions and will vigorously advocate on behalf of the class. Robbins Geller has committed to Northern Nevada Laborers, St. Louis Construction Laborers and Vladimir & Angelica Galkin that it will devote substantial resources to obtaining the best possible recovery for the class. We are confident that, under our direction, Robbins Geller will litigate this action responsibly and efficiently in furtherance of the class's best interests.

I, James G. Mace, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed this 4th day of February, 2013.

LABORERS PENSION TRUST FUND FOR NORTHERN

NEVADA

By: JAMES G. MACE

I, Jeffrey O'Connell, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed this 4th day of February, 2013.

CONSTRUCTION LABORERS PENSION TRUST OF GREATER ST. LOUIS

By: Jeffrey O'Connell

I, Vladimir Galkin, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed this 4th day of February, 2013.

VLADIMIR GALKIN

I, James G. Mace, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed this 4th day of February, 2013.

LABORERS PENSION TRUST FUND FOR NORTHERN NEVADA

By: JAMES G. MACE

I, Jeffrey O'Connell, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed this 4th day of February, 2013.

CONSTRUCTION LABORERS PENSION TRUST OF
GREATER ST. LOUIS

By: Jeffrey O'Connell

I, Vladimir Galkin, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed this 4th day of February, 2013.

VLADIMIR GALKIN

I, Angelica Galkin, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed this 4th day of February, 2013.

ANGELICA GALKIN